



U.S. Department of Justice

*United States Attorney  
Eastern District of New York*

LJF:AEG/SD  
F.#2007R02181

*271 Cadman Plaza East  
Brooklyn, New York 11201*

November 13, 2009

**By Facsimile and ECF**

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Re: United States v. Thomas Archer et al.  
Criminal Docket No. 08-288 (S-1)(SJ)

Dear Counsel:

The government writes to clarify the number of I-687 applications prepared and filed by the defendants. In total, the defendants prepared and filed approximately 234 I-687 applications, none of which were granted. (Eleven have not yet been adjudicated.) While investigating this case, Immigration and Customs Enforcement ("ICE") attempted to collect the majority of these applications. ICE eventually obtained 175 of them. Immigration Officer Mel Shatzkamer reviewed the 175 applications. Those applications are reflected in the reports and chart included in Officer Shatzkamer's section 3500 materials. At trial, the government does not intend to elicit testimony concerning the existence of the approximately 59 I-687 applications prepared and filed by the defendants that have not been reviewed by Officer Shatzkamer.

Respectfully submitted,

BENTON J. CAMPBELL  
United States Attorney

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cc: Clerk of Court (SJ)